

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

YUSEF SALAAM, et al.,

*Plaintiffs,*

v.

DONALD J. TRUMP,

*Defendant.*

Case No. 2:24-cv-05560-WB

**DECLARATION OF JOHN M.  
REEVES IN SUPPORT OF  
DEFENDANT TRUMP'S MOTION  
FOR AWARD OF MANDATORY  
ATTORNEY FEES AND COSTS  
PURSUANT TO 42 P.A. CONS.  
STAT. § 8340.18**

**DECLARATION OF JOHN M. REEVES IN SUPPORT OF DEFENDANT  
TRUMP'S MOTION FOR AWARD OF MANDATORY ATTORNEY FEES AND  
COSTS PURSUANT TO 42 P.A. CONS. STAT. § 8340.18**

I, **JOHN M. REEVES, Esq.**, declare under 28 U.S.C. § 1746:

1. I graduated from Washington University School of Law in 2007. My practice is devoted exclusively to appellate advocacy, including serving as embedded appellate counsel at the trial level and consulting with trial lawyers on preservation and briefing strategy. I am admitted to practice before the United States Court of Appeals for the Third Circuit, and several other federal circuits.
2. To date I have authored and filed over 270 appellate briefs in the Missouri Court of Appeals (all three districts); the Supreme Court of Missouri; the United States Court of Appeals for the Sixth Circuit; the United States Court of Appeals for the Fifth, Sixth, Eighth, Ninth, and D.C. Circuits; and the Supreme Court of the United States. I am also the Co-Founder and former Co-Chair of the Missouri Bar's Appellate Practice Committee.
3. In my practice, I often handle unique and untested areas of law across the United States. Not many practitioners have the creativity and level of expertise to handle this type of litigation. In 2024, for example, I obtained from Justice Alito a temporary administrative stay of a multi-billion dollar bankruptcy plan while it was on appeal to the Third Circuit. *See Claimants v. Boy Scouts of America*, -- S.Ct. --, 217 L.Ed.2d 435 (2024), *subsequently vacated*, 144 S.Ct. 883 (2024).
4. My standard hourly rate at the national level is \$750. Based on my familiarity with billing practices in similar national markets for this type of work, that rate is consistent with what similarly situated specialists charge.
5. I have known Karin M. Sweigart, Esq., for almost four years through national organizations and collaborating on various high profile national cases. I have reviewed

her declaration filed in this case and am well acquainted with her body of work, including precedent-setting defamation and anti-SLAPP victories in California, Georgia, and Washington, D.C.

6. Ms. Sweigart attests that her standard hourly rate is \$750. Given her twenty years of experience, her national reputation for handling novel First-Amendment issues, and the premium rates commonly approved for specialized law counsel in the Third Circuit, I conclude that her rate is reasonable and appropriate.
7. This case involves first-impression questions under Pennsylvania’s 2024 Uniform Public Expression Protection Act. In my professional judgment, retaining an attorney like Ms. Sweigart—who “frequently makes new law” and can brief cutting-edge statutory and constitutional issues efficiently—justifies her premium rate.
8. Based on my knowledge of prevailing market rates for complex litigation and my familiarity with Ms. Sweigart’s credentials and performance, I believe her requested hourly rate and total fee are fair, reasonable, and commensurate with the novelty and importance of the issues before the Court.
9. In addition, the hourly rates for associate, paralegal, and law clerks are also reasonable.

I, **JOHN M. REEVES, Esq.**, declare under 28 U.S.C. § 1746 as follows:

I declare under penalty of perjury that the foregoing is true and correct and is executed this 24<sup>th</sup> day of April 2025, at St. Louis, MO.

  
John M. Reeves